

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

----- X -----  
In re : Chapter 11  
TERRAFORM LABS PTE. LTD., *et al.* : Case No. 24-10070 (BLS)  
Debtors.<sup>1</sup> : (Jointly Administered)  
----- X -----  
Re: Docket No. \_\_\_\_\_

**ORDER APPROVING STIPULATION EXTENDING GOVERNMENTAL  
BAR DATE FOR THE U.S. SECURITIES AND EXCHANGE COMMISSION**

Upon consideration of the *Stipulation Extending Governmental Bar Date for the U.S. Securities and Exchange Commission* (the “**Stipulation**”),<sup>2</sup> a copy of which is attached hereto as **Exhibit 1**; and the Court having jurisdiction to consider the Stipulation pursuant to 28 U.S.C. § 1334; and good and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Stipulation is hereby approved.
2. This Court retains jurisdiction over all matters arising from or related to the implementation or interpretation of this Order.

<sup>1</sup> The Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Debtors' principal offices are located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the terms given to them in the Stipulation.

**Exhibit 1**

**Stipulation**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

---

	x
<b>In re</b>	:
<b>TERRAFORM LABS PTE. LTD., <i>et al.</i>,</b>	: <b>Chapter 11</b>
	:
	: <b>Case No. 24-10070 (BLS)</b>
	:
	: <b>(Jointly Administered)</b>
<b>Debtors.<sup>1</sup></b>	:
	:
	:
	x

---

**STIPULATION EXTENDING GOVERNMENTAL  
BAR DATE FOR THE U.S. SECURITIES AND EXCHANGE COMMISSION**

**WHEREAS**, on January 21, 2024 and July 1, 2024, as applicable, debtors Terraform Labs PTE. Ltd. (“TFL”) and Terraform Labs Limited (“TLL,” and together with TFL, the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of title 11 (as amended, the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

**WHEREAS**, by order entered July 9, 2024 (Docket No. 437) (the “**Bar Date Order**”), the Court set August 9, 2024 (the “**TFL Governmental Bar Date**”) as the deadline by which a governmental unit, as defined in section 101(27) of the Bankruptcy Code, must file proofs of claim against TFL in these chapter 11 cases.

**WHEREAS**, the U.S. Securities and Exchange Commission (“SEC”) is a governmental unit within the meaning of the Bankruptcy Code. *See* 11 U.S.C. § 101(27).

---

<sup>1</sup> The Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Debtors’ principal offices are located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

**WHEREAS**, the SEC has requested out of an abundance of caution, and the Debtors have consented to, subject to the approval of the Court, an extension of the TFL Governmental Bar Date for the SEC to November 1, 2024.

Based on the foregoing, the parties hereby stipulate and agree that:

1. The TFL Governmental Bar Date, solely for the SEC, shall be extended to November 1, 2024 without prejudice to the SEC's right to seek further extensions of such deadline.
2. The remaining provisions of the Bar Date Order shall continue to apply.
3. The terms and conditions of this stipulation shall be immediately effective and enforceable upon its filing with the Court.
4. The Court shall retain jurisdiction over all matters related to the interpretation or enforcement of this stipulation.

# # #

By: /s/ Therese Scheuer

**Therese Scheuer**

100 F Street, NE

Washington, DC 20549

(202) 551-6029 (Telephone)

scheuert@sec.gov

*Counsel for the U.S. Securities and Exchange  
Commission*

By: /s/ Clifford W. Carlson

**WEIL, GOTSHAL & MANGES LLP**

Ronit J. Berkovich (admitted *pro hac vice*)

Jessica Liou (admitted *pro hac vice*)

Clifford W. Carlson (admitted *pro hac vice*)

F. Gavin Andrews (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Email: ronit.berkovich@weil.com

jessica.liou@weil.com

clifford.carlson@weil.com

f.gavin.andrews@weil.com

*Attorneys for Debtors and Debtors in Possession*